FILED
IN CLERKS OFFICE
2017 MAR 22 PM 1 02
U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MASSACHUSETTS AT BOSTON

Case No: 1:17-cv-10453-LTS
Assigned to: District Judge Leo T. Sorokin

City of Boston Inspectional Services Department (ISD), Plaintiff
Represented by: Edward Coburn

Vs.

Helen Cameron, Defendant
Unrepresented by Counsel of Bar

DEFENDANT'S MOTION FOR APPOINTMENT OF COUNSEL IN CIVIL MATTER

Now comes defendant Helen Cameron, (hereinafter "Cameron" or "defendant") and moves this Honorable Court for appointment of Bar counsel to represent her in the above captioned civil matter pending before this court.

Grounds and reasons:

1. Your defendant is accused of failing or refusing to obey Orders of the plaintiff, a Department of Boston Municipal government; This matter was removed from State Court proceedings; Plaintiff is represented by counsel of Bar;

2. Your defendant is unable to afford to pay for legal representation and this Court has determined the defendant to be indigent. If found guilty of the charge, defendant may suffer loss of liberty and/or subject to incarceration (for civil contempt); defendant has a valid cross-complaint but is unable to represent for lack of funds and lack of courtroom experience;

3. Under 14th Amendment to the United States Constitution Due Process law, a (criminal) defendant subject to loss of liberty is entitled to legal representation. In Lassiter v. Department of Social Services of Durham Cty., 452 U.S. 18 (1981), a case that focused upon civil proceedings ...., the Court wrote: "the pre-eminent generalization that emerges from this Court's precedents on an indigent's right to

appointed counsel is that such a right has been recognized to exist only where the litigant may lose his physical liberty if he loses the litigation.".

Wherefore, under the principles of *Lassiter*, the defendant moves this Honorable Court for appointment of experienced counsel of Bar to represent her in this civil matter.

Respectfully,

Helen Cameron
98 Topliff Street
Dorchester, MA 02122
March 21, 2017

Certificate of Service

I certify that on March 21, 2017, I mailed by U.S. certified Mail, sufficient postage affixed, a copy of this Defendant's Motion for Appointment of Counsel in Civil Matter as follows:

Edward Coburn
Taylor, Duan, Barton & Gilman, LLP
111 Devonshire Street – 5th Floor
Boston, MA 02109

Respectfully,

Helen Cameron
98 Topliff Street
Dorchester, MA 02122
March 21, 2017